

# EXHIBIT D

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*Via email:* [bschuurman@velaw.com](mailto:bschuurman@velaw.com)

Re: *AdvanceMe v. RapidPay, et al.; AdvanceMe v. Amerimerchant*

Dear Bill:

Further to our telephone conversation of this afternoon about the third party depositions scheduled for next week in Atlanta, I understand from you as follows:

1. The dates selected are dates preferred by these third party witnesses;
2. You notified our side of those dates over a week ago; and,
3. You are willing to reschedule a 30(b)(6) deposition which conflicts with the second third party deposition scheduled in Atlanta to accommodate Robert Matz's schedule.

I am sending a copy of this letter to my folks to confirm that we are all working off of the same information. If we are, we should be able to resolve this. I'll be traveling but have asked Deborah Race to stay in touch with you

Best regards.

Very truly yours,



Otis Carroll  
For the Firm

OC:nc

cc: Deborah Race (firm)  
Ron Lemieux  
Michael Edelman